EXHIBIT 9

Redacted Version of Document Sought to be Sealed

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1
                 IN THE UNITED STATES DISTRICT COURT
        NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 2
 3
       CHASOM BROWN, WILLIAM BYATT,
 4
       JEREMY DAVIS, CHRISTOPHER CASTILLO,)
       and MONIQUE TRUJILLO, individually )
 6
       and on behalf of all others
 7
 8
       similarly situated,
                                            )
 9
             Plaintiffs,
10
                                            ) Case No.:
           vs.
                                            ) 5:20-cv-03664-YGR-SVK
11
       GOOGLE, LLC,
12
             Defendant.
                                            )
13
14
                            CONFIDENTIAL
15
                 VIDEO-RECORDED REMOTE DEPOSITION OF
16
                      BRUCE A. STROMBOM, Ph.D.
17
                       Long Beach, California
18
19
                Thursday, August 18, 2022; 8:07 a.m.
20
21
       REPORTED BY:
       Victoria A. Guerrero, CSR, RPR, RMR, CRR
22
       JOB No. 5344578
23
24
25
       PAGES 1 - 181
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1	that we identified.	11:14:34
2	Q Do the Ads Impact document include any	11:14:38
3	reference to net profit margin?	11:14:40
4	A No. The Ads Impact study only looked at	11:14:45
5	revenue.	11:14:48
6	Q Can you identify for me on the evidence	11:14:52
7	that anyone at Google faulted that Ads Impact	11:14:54
8	analysis for somehow inappropriately admitting	11:14:57
9	consideration of expenses?	11:15:02
10	MS. TREBICKA: Objection to form.	11:15:03
11	THE WITNESS: I'm not saying first of	11:15:05
12	all, it's not my opinion it was improper for that	11:15:07
13	study to not calculate profits. It was clearly	11:15:10
14	driven as an estimate of the revenue impact.	11:15:16
15	So whether it's proper or improper depends	11:15:20
16	on the purpose of the analysis. And the purpose of	11:15:23
17	a damage analysis of unjust enrichment is to	11:15:27
18	evaluate the impact on profits, not just the impact	11:15:32
19	on revenue.	11:15:37
20	So it may be perfectly fine for the	11:15:39
21	purposes of their study, in the study,	11:15:44
22	but it's not appropriate for purposes of a damage	11:15:47
23	analysis, in my opinion.	11:15:50
24	BY MR. REBLITZ-RICHARDSON:	11:15:52
25	Q And did you talk to anybody about the	11:15:53
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